

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CLARENCE BOWEN ALLEN, BRENDA BERMAN, :
ANNETTE BIRDSOING, WILLIAM HENRY, JOSE :
JACOB, JACQUELINE KING, SUSAN LAMONICA, :
JEAN PHIPPS, ROSLYN PRESS, HERBERT :
RICHARDSON, VIRGINIA TUFARO, on behalf of : **DECLARATION OF ROSLYN**
themselves and on behalf of all other similarly situated: **PRESS**
individuals,, :
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Plaintiffs, : 19-CV-3786 (JMF)
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-against- :
:
THE CITY OF NEW YORK and NEW YORK CITY :
HEALTH AND HOSPITALS CORPORATION, :
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Defendants. :
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I, Roslyn Press, declare as follows:

1. I make this statement on the basis of my personal knowledge and, if called as a witness, could and would testify as to its contents.
2. I am a 71 year-old woman and former employee of Defendants City of New York and New York City Health and Hospitals Corporation, at Jacobi Medical Center.
3. Defendants terminated my employment in June 2017 as part of their policy entitled the Managerial Efficiency Improvement Initiative ("MEII").
4. I was 67 years old at the time Defendants terminated my employment.
5. I began my employment with Health and Hospitals in 2008 and held the position of Assistant Director of Hospitals when I was terminated in June 2017.
6. Despite the fact that we were told by Jacobi Medical Center management that the MEII would not include any layoffs, I learned about my termination after being asked to attend a

meeting with human resources. There, the Director of Human Resources informed me that my job was being eliminated.

7. I brought this complaint because I believe the reason for my termination from Jacobi Medical Center was because of my age. Most of the employees who were terminated in 2017 were over the age of 40, including myself. Moreover, at the time of the termination, Jacobi had already begun the process by which they started hiring younger people in place of people who had been laid off in February 2017 and people who had been fired previously.

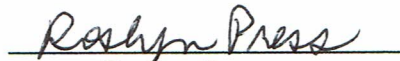
8. I believe that Defendants' decision to terminate Health and Hospitals employees because of their age, evidenced by their later decisions to fill positions with younger individuals, is improper and a violation of Defendants' own policies. It underscores Defendants' attitude of intolerance for those of a certain age or otherwise part of a protected class.

9. It is beyond demoralizing to risk my emotional and financial wellbeing and have my status in a protected class used against me under the guise of financially necessary reductions in force. Defendants' actions also diminished my career opportunities and caused me significant loss of income and pension benefits.

10. My first-hand experience unfortunately is not unique. The mistreatment that I have faced being terminated from my employment based on my age is the same or substantially similar to the mistreatment other Health and Hospitals employees experienced who are also members of protected classes.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 28 day of December, 2021, in Shrub Oak, New York.


Roslyn Press